

RE-000000C-14-0112



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ARIZONA CORPORATION COM
UTILITY COMPLAINT FORM

Investigator:

Phone:

Fax: (602) 542-2129

Priority: Respond Within Five Days

Inquiry No. 2014 - 115987

Date: 4/28/2014

Complaint Description: 19B Other - R & R's
N/A Not Applicable

Complaint By: First: Josh Last: Lieberman

ORIGINAL

Account Name: Josh Lieberman

Home: (0) 000-0000

Street: n/a

Work:

City: n/a

CBR:

State: WA Zip: n/a

is:

Utility Company: Miscellaneous Solar

Division: electric/solar

Contact Name: n/a

Contact Phone: (000) 000-0000

Nature of Complaint:

Arizona Corporation Commission

DOCKETED

APR 29 2014

Name: Josh Lieberman

Date: 4/22/2014

Address:

Phone:

City/State/Zip: Washington

Cell:

Docket: PROPOSED RULEMAKING TO MODIFY THE RENEWABLE ENERGY STANDARD RULES IN ACCORDANCE WITH ACC DECISION NO. 74365

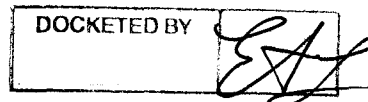
Docket No: RE-000000C-14-0112

Utility: Arizona Corporation Commission - Electric Services

Position: Other

Email:

Comments: The Renewable Energy Markets Association (REMA) again appreciates the opportunity to provide comments on the Arizona Corporation Commission Staff's consideration of REST rules modifications. REMA is a non-profit association that represents organizations that sell, purchase, or promote renewable energy products in North America, which includes Renewable Energy Certificates (RECs), retail green power programs, utility green pricing services, and on-site renewable energy solutions. Our non-profit and for-profit members alike support policies that maintain consumers' freedom to buy and sell renewable energy voluntarily, above and beyond state mandates. A market for renewable energy (e.g. RECs) is alive and well in Arizona. However, many of the ACC Staff's proposed seven solutions would jeopardize this market by injecting uncertainty into the ownership of RECs. As has been presented before the Commission, when there is a simultaneous ownership claim to a REC, the monetary, compliance, and environmental value of the REC becomes worthless. The Center for Resource Solutions (CRS) reported in comments to the Commission dated May 31, 2013, that Arizona had, "approximately 2,986 residential customers and 146 non-residential customers purchase renewable energy in the voluntary market, and Arizona renewable generators generated nearly 29,997 MWh" that were sold into the voluntary



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market. The Department of Energy's National Renewable Energy Lab (NREL) has estimated that the national voluntary market nationwide has seen annual growth rates of around 10%. These are markets for RECs that put cash in the pockets of Arizonian home and business owners, an economic opportunity that will likely grow over the upcoming years. It does not matter whether a REC is worth \$3 or \$300; it belongs to the generator for use at their discretion. REMA has reviewed the seven potential solutions before the Commission and recommends instituting a REC marketplace to demonstrate utility DG compliance whereby RECs are procured from eligible generators. A REC marketplace or auction mechanism would avoid double counting concerns and offer a clear pathway to compliance. Any further consideration of the Track & Monitor and Track & Record mechanisms perpetuates the problem of demonstrating REST compliance (or reducing REST compliance targets) by infringing on the property rights of generators. Again, REMA wishes to thank the ACC for consideration of its comments in response to Docket No: RE-00000C-14-0112. Should a member of the commission have questions, please do not hesitate to contact us with the information seen below.

End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

docketed

End of Comments

Date Completed: 4/28/2014

Inquiry No. 2014 - 115987
